

EASTERN DISTRICT OF PENNSYLVANIA

Defendant.

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JOINT MOTION TO STAY CASE PENDING MEDIATION

can engage in mediation. In support of this motion, the Parties state as follows:

4. The Parties have been actively engaged in discovery.

5. The Parties' counsel has conferred about mediation, and the Parties are interested in exchanging certain confidential discovery and retaining a private third-party so they can attempt to settle Plaintiff's claims.

6. To accommodate their efforts to potentially settle this matter, the Parties request that this Court stay the case while they engage in the mediation process.

7. The Parties submit that a stay is appropriate in these circumstances because it will enable them to focus their time and resources on reaching a settlement, and potentially alleviate the Parties and this Court from expending unnecessary time and resources litigating the case.

8. The Parties anticipate that they will need approximately 120 days to complete the exchange of discovery and engage in the mediation process.

9. In addition to staying the case, the Parties request that the case be scheduled for a status conference on a date convenient for the Court that is 120 days or more from the date a stay is entered.

10. The Parties can file a status report by that date which notifies this Court whether (1) the Parties have reached a settlement and need a briefing schedule to submit the settlement for this Court's approval, (2) the Parties need additional time to continue settlement negotiations, or (3) the Parties have been unable to settle the case and request that the stay be lifted.

11. The Parties will file the status report prior to the date of the status conference if the settlement negotiations reach an impasse or the Parties reach a settlement before then.

12. As the Parties are jointly requesting the same relief, neither Plaintiff nor Defendant will be prejudiced by a stay and there are no competing equities weighing against staying the case.

For the foregoing reasons, the Parties respectfully request that this Court enter an order staying this action and all operative deadlines therein. The Parties further request that the Court

schedule a status conference on a date that is 120 days or more from the date a stay is entered in this case.

Respectfully submitted,

QURAN HERRINGTON,
individually and on behalf all others
similarly situated,

By his attorneys,

/s/ Brook S. Lane

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Dated: February 20, 2025

SOLID WASTE SERVICES, INC.
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By its attorney,

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